

# Activating Legal Protections for Archaeological Remains of Historic Chinatown Sites

## Lessons Learned from Oakland, California

(Original Title: Rediscovering Oakland's San Pablo Avenue Chinatown)

*Anna Naruta*

While state law protects archaeological resources, a major redevelopment project planned for the site of one of Oakland's earliest Chinatowns showed community members they had to struggle to get the developer to meet their legal obligations. This paper discusses a few of the lessons learned in activating legal protections for unique and significant archaeological sites.

### ACTIVATING LEGAL PROTECTIONS

The California Environmental Quality Act (CEQA) not only protects historic buildings and landscapes, it protects unique and significant archaeological remains.<sup>1</sup> City Planning departmental reviews of whether a development project will adversely impact the environment are therefore legally required to assess potential "impacts" to historic buildings and potential archaeological remains. If the project will impact a resource, and the impact cannot be avoided, the project is required to "mitigate" the impact in a manner that compensates for the damage to or loss of an irreplaceable cultural resource. In designing mitigations, the guiding principal is that after the project is complete, the mitigated resource should be at least equal to the resource that was destroyed. For a potentially unique and significant archaeological site, if a project cannot be designed to avoid impacting the site, the site must be studied and excavated by a qualified archaeological team, an extensive report published, and the archaeological documents and artifacts curated in a permanent repository accessible to researchers.

That's the theory, anyway. But when a national development corporation started the Environmental Impact Review process for a project that would redevelop the site of one of Oakland's earliest Chinatowns, we found there's nothing automatic about the process of assessing and mitigating a project's impacts. It's up to community members to activate the legal protections for significant cultural resources.

In our case, the site was what long-time Oaklander Edward Chew records as the site of the "official" Chinatown of the late 1860s and 1870s, created along San Pablo Avenue near today's 20th Street. Chew writes that this Chinatown was established after city authorities refused to allow the rebuild-

ing of the first "official" Chinatown on Telegraph near today's 17th Street, after it was destroyed in a fire. The next year, the City extended its main street, Broadway, northward through the former Chinatown site. The dislocations continued; residents of the San Pablo Avenue Chinatown were "consigned" to live at the City's industrial south shore, and the Charter Avenue Chinatown site (today's Grand Avenue) resulted from an 1880s redevelopment of the San Pablo Avenue Chinatown site. Very little is known of these historic Chinatown sites, although their existence is well established through a few mentions in historic newspapers and the federal census. The paucity of information about the Chinatowns underscores the legal significance of any potential archaeological remains.<sup>2</sup>

While the draft Environmental Impact Report for the project acknowledged that the project area had a high likelihood of containing archaeological remains of the historic Chinatown, it initially made no provision for archaeological study. Instead, the only "mitigation" was to have archaeological monitoring during construction. This procedure usually fails either in adequately mitigating the archaeological resource or in keeping the project on schedule, or—most frequently—both.<sup>3</sup> A pre-construction archaeological study was essential for the developer to be able to meet the legal protections for potentially unique and significant archaeological remains.

To activate the legal protections, community members spent countless hours spreading the word about the archaeological issue, calling and writing City Council members, and speaking at public meetings. Recognizing the importance of the potential archaeological site, the City Council adopted a requirement for a full pre-construction archaeological study into their agreement with the developer. The mitigation measures that the City Council adopted incorporated a public review process for the archaeological testing and treatment plan, specifying that the City would seek comments on the draft archaeological treatment plan from "established local Chinese-American organizations, including the Chinese Historical Society of America and the Oakland Asian Cultural Center."<sup>4</sup>

While it was hard won, the public review procedure was not an extraordinary measure. In terms of how local governments conduct Environmental Impact Reviews, seeking public comment on the archaeological testing and treatment plan

merely brought the proposed archaeological mitigation plan into the same sort of public review process routinely undertaken for proposed mitigations to impacts on historic buildings, traffic patterns, or air or water quality.

The remainder of this paper shares lessons we learned in this process.

## METHODS MATTER

In the world of cultural resource management, doing a “pre-construction archaeological study” can mean virtually anything. Some methods to discover existing intact historical archaeological remains are proven to fail but are still commonly used in legally mandated studies. One example of an investigation method proven to fail is geotechnical soil bores or auger testing. This method may be appropriate for discovering sites such as Native Californian shellmounds, sites that are meters deep and wide. But these soil bores are likely to miss remains of sites such as early U.S.-period California towns. Another method, backhoe trenching, tends to discover archaeological remains simultaneous with destroying them, or, at best, while removing significant contextual data that is required for archaeological interpretation.<sup>5</sup>

Mechanical methods can be employed to good effect, however. A backhoe with a flat-edged bucket can be an effective tool that allows archaeologists to rapidly expose a wide area of historic soil at one time and excavate by hand when potential archaeological remains are encountered. Such “areal” or “horizontal” excavations provide the archaeologist with a better chance to observe the relationships between archaeological deposits and to form a discovery method that is efficient, cost effective, and appropriate to historical archaeological remains. An additional factor that can determine whether effective archaeological interpretations of the site will be possible is whether there is adequate observation and recording of geomorphological data. This is the data that speaks to when and how the archaeological deposits were created and lets those of us who were not on-site for the excavations “see” what the site looked like.<sup>6</sup>

Whether the archaeological study would conduct the historical research necessary to perform an adequate assessment proved to be another issue. We found that contracting archaeologists did not necessarily utilize the basic set of historic documents that could reveal early land uses. Instead of conducting basic land-use research using documents such as property records, chains of title, and the federal census, contractors frequently relied on historical accounts found in secondary and tertiary sources as well as maps that post-dated the time period for which legally-significant archaeological remains may exist.<sup>7</sup> In the future, mitigations may need to specify either the general scope of landuse research required or specifically name documents and records that must be studied.

## SELECTING A “QUALIFIED ARCHAEOLOGIST”

The Secretary of the Interior provides standards for who can be considered a “qualified archaeologist.” The standards require that the archaeologist have a proven track record of bringing archaeological work from excavation and analysis through completing the final stage, public reporting. These are minimum standards. It’s also relevant to ask how a particular contractor meets the Secretary of the Interior’s standards with regards to archaeology of a site associated with historic Chinese Americans. Relevant questions include: (1) what experience the archaeological contractor has in the archaeology of that region; (2) whether the contractor has demonstrated full completion of projects on historic sites associated with Chinese Americans; (3) whether the contractor has qualified Chinese Americanists on staff or will consult with qualified Chinese Americanists during all phases of the study, and not merely at the end of the project; and (4) whether the contractor has a proven track record of completing and fully reporting basic analysis and cataloging of materials.<sup>8</sup>

## OVERSIGHT

Review of an archaeological treatment plan is analogous to the established city planning procedures of design review for new construction projects, or a Landmarks Board review of proposed alterations to a historic site. Despite this established precedent, City oversight of the archaeological process does not seem to be as firmly established. We found an important question to be whether the City’s reviewing agency, such as planning staff or a Landmarks Board, has archaeological expertise available, or whether the State Historic Preservation Officer may need to be called on to review the mitigation plan for adequacy. As our City government does not have a staff archaeologist or archaeological expertise represented on the Landmarks Board, public participation in review of the plan formed an essential step in helping the project meet CEQA guidelines for adequate treatment of potential archaeological resources.<sup>9</sup>

Oversight of the final archaeological plan and in-progress archaeological project is an area where the mitigation measure language failed. In this language, the oversight role is assigned to an entire City agency, the Community and Economic Development Agency. A particular overseeing staff member should have been named. The consequences are not trivial—to date we are still awaiting response regarding who at the City is overseeing the project to ensure compliance with CEQA and the adopted mitigation measures.

A concurrent redevelopment project made clear that the mitigation measure language should be altered to ensure both accountable oversight and a better procedure for community participation. This redevelopment project impacted an area

that was the site of either the immediate neighbors of the Chinatown or the historic Charter Avenue Chinatown itself. Community research demonstrated the existence of the Chinatown, and the contracting archaeologist concurred the site was likely to contain historical archaeological remains. With community members advocating for the potential archaeological remains, the developer at the last minute voluntarily adopted mitigation measures that seemed to be identical to those adopted for the San Pablo Avenue Chinatown site. The developer agreed to a focused community review of the archaeological study “prior to construction” and additionally called for stopping all work and allowing archaeological evaluation if a single archaeological artifact was discovered during construction.<sup>10</sup>

In this case, that the community review of the archaeological plan was slated to happen “prior to construction” instead of “prior to any removal of foundations or other ground-disturbing activities” meant that it never happened. Instead, the work demolishing the existing historic structures flowed into removing soil in preparation for the new construction. After the buildings were demolished, earthmoving equipment was brought in to stir up and then compact what was euphemistically called the project area’s “unconsolidated historic fill”—that is, the potential archaeological site. By the time the project hit the mitigation measure’s trigger, the commencement of construction, there was likely no intact site left. The archaeological monitoring plan, which required construction workers to call a halt to the project if an historic artifact was found, also failed. Although casual observation of the project area showed the demolition and other ground-disturbing work exposed buried historic items, and therefore would have triggered an archaeological assessment within twenty-four hours, an archaeologist was never summoned. It may never be known if unique and significant archaeological resources were destroyed.<sup>11</sup>

## CURATION

Since the intended goal of mitigations is that the cultural resource remaining at the end of the project is at least equal to the cultural resource that existed before the project, CEQA guidelines have been amended to specifically state that if the impact cannot be avoided, mitigation measures can include curation of the resultant archaeological collection. The mitigation measures adopted for the San Pablo Avenue Chinatown unfortunately have left the curation stage of the archaeological collection as something yet to be negotiated. Adequate curation poses a challenge. Facilities that curate archaeological collections in accordance with the State of California’s “Guidelines for the Curation of Archeological Collections” routinely charge \$1,000 per each cubic foot (a bankers’ box worth) of materials. Even so, most such facilities are no longer accepting new collections due to lack of space. The

solution for the final curation plan should be specified in the mitigation measures.<sup>12</sup>

## PROACTIVE STUDY

Activating legal protections for the rediscovered San Pablo Avenue Chinatown highlighted the need for further work that could identify existing cultural resources relating to California’s Chinese heritage before they might be threatened by redevelopment. Hometown Oaklander Kelly Fong, then a senior in archaeology at the University of California, Berkeley, conducted a volunteer research project to identify further historic sites associated with nineteenth- and early twentieth-century Chinese Oaklanders. Fong compiled the lists of Oakland Chinese businesses from three sources: the 1882 *Wells Fargo Directory of Chinese Business Houses*; the first one hundred Oakland Chinese Merchant Partnership case files generated as part of the enforcement of the Chinese Exclusion Act and now preserved at the National Archives, San Bruno; and the businesses, residences, and other establishments labeled as “Chinese” on the surviving volume of the 1889 Sanborn Fire Insurance Company map of Oakland. She produced a database of early Chinese businesses by street address, and plotted the locations on a map. The results not only expand ideas about early Chinese Oaklanders, demonstrating that many early Chinese Californians lived and worked outside of established Chinatowns, but also provide a first step in proactively protecting historic buildings or potential archaeological remains associated with these sites. The results of Fong’s study are on file with the City of Oakland’s Cultural Heritage Resource Survey, where the information will be included in future city planning assessments.<sup>13</sup> Placing such studies in the regional governmental repository for archaeological records (such as the California Archaeological Site Survey Northwest Information Center) can increase the likelihood the data will be incorporated in Environmental Impact Reviews.

## CONCLUSION

Our experience with activating legal protections for significant potential archaeological resources taught us a number of lessons. Mitigation measures should spell out the who, what, where, when, and how of all steps in explicit detail. Long-term curation procedures, if applicable, need to be addressed as part of the project’s initial Environmental Impact Review. We demonstrated that public review by community members and other archaeological practitioners provides a better opportunity for planned mitigations to meet legal obligations for protecting significant cultural resources. Our experience also highlights the current gap in standards for and oversight of archaeological projects, at both the local and state level. Perhaps most of all, our experience highlights the need for

active community involvement in researching and preserving historical and archaeological resources. With redevelopment projects continuing to impact significant sites of our Chinese heritage, it will be communities who ultimately decide the fate of these cultural resources.

## NOTES

1. The complete CEQA guidelines can be found on the state's website, <http://ceres.ca.gov/ceqa>. (Any project that draws on federal funds is subject to more stringent review, under Section 106 of the National Historic Preservation Act.)
2. Edward W. Chew was the son of Ng Poon Chew (1866–1931), a civil rights crusader who edited and published San Francisco's major turn-of-the-century Chinese-language newspaper, *Chung Sai Yat Bo*. A resident of Oakland since the 1906 San Francisco earthquake, Edward Chew's father—if not Edward Chew himself—was likely to have been in direct communication with the people who had lived in the San Pablo Avenue Chinatown. In 1952, on the occasion of Oakland's 100-year anniversary, Edward Chew published a special article in the *Oakland Tribune* relaying the history of Oakland's early Chinatowns and preserving important community oral history. Chew's article provided clues that allowed discovery of further information about the San Pablo Avenue Chinatown. See Willard T. Chow, "The Reemergence of an Inner City: The Pivot of Chinese Settlement in the East Bay Region of the San Francisco Bay Area" (Ph.D. diss., University of California, Berkeley, 1974); Anna Naruta, *Oakland's San Pablo Avenue Chinatown: A Compilation of Research to Aid the Upcoming Archaeological Sensitivity Study and Treatment Plan to Be Drafted by the Archaeological Contractor for Forest City's Uptown Redevelopment Project*, *UptownChinatown.org*, January 2005 (on file at the Oakland Cultural Heritage Survey, Oakland Public Library, and the Oakland Asian Cultural Center); Anna Naruta, "Creating Whiteness in California: Racialization Processes, Land, and Policy in the Context of California's Chinese Exclusion Movements, 1850 to 1910" (Ph.D. diss., University of California, Berkeley, 2006), 139–177.

Archaeological remains that can provide information unavailable from other sources meet CEQA criteria for a legally significant archaeological resource. (See the CEQA code for other significance criteria.) A review of archaeological investigations of California Chinatown sites demonstrates that while archaeological research has substantial accomplishments, the current archaeological sample is so small that any potential archaeological site associated with Chinese Americans meets the CEQA criteria for a unique and significant (and therefore legally protected) cultural resource. See Naruta, "Creating Whiteness," 71–77, 136–138, 229–233.

3. One of the problems of archaeological monitoring is that it frequently produces out-of-context materials, a situation that renders archaeological interpretation impossible. For a discussion of the failure of archaeological monitoring at a site identified as the location of Oakland's first Chinatown, see Naruta, "Creating Whiteness," 145–148. The identification of Oakland's current City Hall location as the site of the earliest Chinatown is given in L. Eve Armentrout Ma and Jeong Huei Ma, *The Chinese of Oakland: Unsung Builders*, ed. Forrest Gok and the Oakland Chinese History Research Committee (Oakland: Oakland Chinese History Research Committee, 1982), 32; and L. Eve Armentrout Ma, *Hometown Chinatown: The History of Oakland's*

*Chinese Community* (New York and London: Garland Publishing, Inc., 2000), 29.

4. As an aid to other communities facing threats to potential archaeological resources, the full text of the cultural resource mitigations and public review process that Oakland City Council adopted for Forest City's Uptown Mixed Used Redevelopment Project is provided below and at <http://UptownChinatown.org>. This paper discusses some of the areas where the adopted language falls short, such as in specifying curation of archaeological materials, and naming specific staff charged with overseeing the archaeological mitigations measures. We will likely discover additional shortcomings as the mitigation process proceeds.

The following language was adopted by Oakland City Council on July 30, 2004 for inclusion in the Mitigation Monitoring and Reporting Plan (MMRP):

New HIST-2a and HIST-2b REFLECTING CITY REVISIONS AND RECOMMENDATIONS TO COUNCIL 6-30-04

### Mitigation Measure

HIST-2a: A pre-construction archaeological testing program shall be implemented to help identify whether historic or unique archaeological resources exist within the Project site. Examples of potential historic or unique archaeological resources that could be identified within the Project site include: back-filled wells; basements of buildings that pre-date Euro-American buildings that were constructed on the Project site; and back-filled privies. For these resources to be considered significant pursuant to CEQA, they would have to have physical integrity and meet at least one of the criteria listed in *CEQA Guidelines* section 15064.5(a)(3) (for historic resources) and/or CEQA section 21083.2(g) (for unique archaeological resources). These criteria include: association with events that have made a significant contribution to the broad patterns of California history and cultural heritage; association with the lives or persons important in our past; embodiment of the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; yield, or may likely yield, information important in prehistory or history; contains information needed to answer important scientific research questions and be subject to a demonstrable public interest in that information; have a special and particular quality such as being the oldest of its type or the best available example of its type; or be directly associated with a scientifically recognized important prehistoric or historic event or person.

The testing program shall be guided by a sensitivity study (including a history of previous land uses) and shall use a combination of subsurface investigation methods (including backhoe trenching, augering, and archaeological excavation units, as appropriate). The purpose of the sensitivity study and testing program is to: (1) identify the presence and location of potentially-significant archaeological deposits; (2) determine if such deposits meet the definition of a historical resource or unique archaeological resource under section 21083.2(g) of the CEQA statutes; (3) guide additional archaeological work, if warranted, to recover the information potential of such deposits; and (4) refine the archaeological monitoring plan.

Representatives of established local Chinese American organizations (including the Chinese Historical Society of America and the Oakland Asian Cultural Center) shall be invited to participate in a focused community review of the sensitivity study and plan for the subsequent testing program prior to initiation of subsurface investigation. The City shall consider the community comments in finalizing the sensitivity study and testing program.

If historic or unique archaeological resources associated with the Chinese community are identified within the project site and are further determined to be unique, the City shall consult with representatives of an established local Chinese American organization(s) regarding the potential use of the archaeological findings for interpretive purposes.



*Implementation Procedure*

(1) Project Sponsor shall retain an archaeologist to implement a pre-construction archaeological testing program, as described in the mitigation measure.

(2) Archaeologist shall provide the sensitivity study and plan for the archaeological testing program for focused community review by representatives of established local Chinese American organizations (including the Chinese Historical Society of America and the Oakland Asian Cultural Center). Community reviewers shall be provided 14 days to review sensitivity study and archaeological testing program and provide written comments. The City shall consider the community comments in finalizing the sensitivity study and archaeological testing program.

(3) Archaeologist shall prepare a plan for additional data recovery of archaeological material, if deemed necessary.

(4) If additional data recovery of archaeological material is deemed necessary, Archaeologist shall submit the plan to focused community review by representatives of established local Chinese American organizations (including the Chinese Historical Society of America and the Oakland Asian Cultural Center). Such community reviewers shall be provided 14 days to review the plan and provide written comments.

(5) Project Sponsor shall consult with representatives of the Chinese American community regarding the potential use of archaeological findings.

*Monitoring Responsibility*

(1) through (5): City of Oakland Community and Economic Development Agency, Planning Division.

*Monitoring and Reporting Action*

(1) Receive notice that an archaeologist has been retained.

(2) Verify that appropriate groups have been contacted to review sensitivity study and archaeological testing program. Verify community comments have been collected and reviewed and considered.

(3) Verify that a research design is prepared.

(4) Verify that appropriate groups have been contacted to review research design and plan for additional data recovery. Verify community comments have been collected and reviewed and considered.

(5) Verify that the appropriate groups have been contacted regarding archaeological findings within the Project site.

*Monitoring Schedule*

(1) through (4): Prior to approval of any permit that authorizes removal of foundations or work below finished grade.

(5) During Project construction.

*Non-Compliance Sanction*

(1) through (4): No approval of any permit that authorizes removal of foundations or work below finished grade.

(5) City issues corrective action or stop work order.

*Mitigation Measure*

HIST-2b: Archaeological monitoring of ground-disturbing construction in the Project area shall be conducted, as appropriate and if necessary, based on the results of the pre-construction testing program and the potential for encountering unidentified archaeological deposits. Upon completion of the pre-construction testing program specified in Mitigation Measure HIST-2a, the extent of archaeological monitoring during Project construction will be assessed, and the scope and frequency of the monitoring required by this mitigation measure shall be based on the findings of this assessment. Monitoring shall be conducted by a cultural resource professional approved by the City who meets the Secretary of the Interior's Professional Qualifications Standards for Prehistoric and Historical Archaeology.

Upon completion of such archaeological monitoring, evaluation, or data recovery mitigation, the archaeologist shall prepare a report documenting the methods, results, and recommendations of the investigation, and submit this report to the NWIC (Northwest Information Center). Public displays of the findings of archaeological recovery excavation(s) of historical or unique resources shall be prepared. As appropriate, brochures, pamphlets, or other media,

shall be prepared for distribution to schools, museums, libraries, and—in the case of Chinese or Chinese American archaeological deposits—Chinese American organizations.

*Implementation Procedure*

(1) Project Sponsor shall retain an archaeologist to monitor ground-disturbing activity within the Project site, as described in the mitigation measure.

(2) Archaeologist shall halt work in the vicinity of the archaeological resource until findings can be made regarding whether the resource meets the CEQA definition of an archaeological or historic resource.

(3) If identified archaeological resources meet CEQA criteria for archaeological or historic resources, they shall be avoided by demolition or construction activities. If avoidance is not feasible, then effects to the deposit shall be mitigated through a data recovery strategy developed by the evaluating archaeologist, as described in the mitigation measure. This report shall be submitted to the NWIC.

*Monitoring Responsibility*

(1) through (3): City of Oakland Community and Economic Development Agency, Planning Division.

*Monitoring and Reporting Action*

(1) Receive notice that an archaeologist has been retained.

(2) Verify that work is suspended if archaeological resources are found.

(3) Review and approve the archaeological resources mitigation plan, if one is prepared.

*Monitoring Schedule*

(1) Prior to approval of any permit that authorizes removal of foundations or work below finished grade.

(2) During demolition or Project construction.

(3) During Project construction.

*Non-Compliance Sanction*

(1) No approval of any permit that authorizes removal of foundations or work below finished grade.

(2) City issues corrective action or stop work order.

(3) City issues corrective action.

5. An Oakland mitigation project obtained a false negative when using soil bores to assess whether significant historical archaeological remains might be present. The estimation that nineteenth-century historical archaeological remains would have been eliminated through the mid-twentieth-century construction of buildings with "extensive basements" also proved to be incorrect. For the preconstruction assessment, see Jan M. Hupman and David Chavez, *Archaeological Resources Investigation for the Oakland Administration Building Project, Oakland, California* (David Chavez & Associates, P.O. Box 52, Mill Valley, CA 94941), submitted to Environmental Science Associates, Inc. (301 Brannan Street, San Francisco, CA); California Archaeological Site Survey Northwest Information Center file #S-16863 (June 1994), 22–23, 34–35, 61. During construction, the archaeological monitor found intact historical archaeological deposits and recovered objects dating to as early as 1840, as reported in Colin Busby, *Archaeology Services, City Administration Building—Project L74021: Final Monitoring Report*, letter to City of Oakland Project Manager Jack Young, April 22, 1996 (Basin Research Associates, 1933 Davis Street, Suite 210, San Leandro, CA); California Archaeological Site Survey Northwest Information Center file #S-18536 (1996). For a discussion of how these mitigations failed to meet adequate treatment for archaeological remains under the legal protections of CEQA, see Naruta, "Creating Whiteness," 146–148.
6. For a discussion of how geomorphological data plays an essential role in archaeological interpretation of Chinatown sites, see Naruta, "Creating Whiteness," 71–138, 214–216. One resource for archaeologists is Stewart Reed, Nathan Bailey, and

Oghenekome Onokpise, *Soil Science for Archeologists*, vol. 1, ed. Michael Russo and Virginia Horak, Florida Agricultural and Mechanical University and Southeast Archeological Center, National Park Service, June 2000, <http://www.cr.nps.gov/seac/soils-index.htm>.

- 7 This was the case for the above-mentioned archaeological mitigations reported in Hupman and Chavez, *Oakland Administration Building Project*, and Busby, *Final Monitoring Report*, and also an archaeological mitigation for Upper Chinatown that formed after the dislocation of the San Pablo Avenue Chinatown, Archeo-Tec, *Cultural Resources Evaluation for the Broadway-West Grand Project*, submitted by Allen Pastron, Archeo-Tec, to Patrick Van Ness, Signature Properties, for City of Oakland, Case File Numbers ER03-0022, PUD03552, PUDF03553, September 15, 2004. For the San Pablo Avenue Chinatown, a compilation of basic research was prepared and donated to the project to give the archaeological contractors a better starting point for their research. See Naruta, *Oakland's San Pablo Avenue Chinatown*.

8. While we prepared a list of Bay Area historical archaeologists who met the Secretary of the Interior's Standards with regards to previous work on Chinatown sites (see <http://UptownChinatown.org>), the developer apparently did not seek bids from any of them.

It's worth stipulating that the archaeological contractor must complete the full preliminary analysis and cataloguing of artifacts, including determining minimum number of specimens represented by the fragmented artifacts and checking ceramic fragments for "crossmends" with fragments from other deposits from the same site. If fragments from different deposits show themselves to have been part of the same item, this provides data about the relationship between the different deposits. Analyzing ceramics through determining crossmends is therefore part of the basic reporting of a site. See Naruta, "Creating Whiteness," 208–217.

- 9 Community review helped redirect the archaeological contractor to areas that primary source documents indicated were likely to contain archaeological remains of the San Pablo Avenue Chinatown. See Allen G. Pastron and Allison Vanderslice, *DRAFT Archaeological Sensitivity Study and Testing Program for the Uptown Mixed-Use Project, City Of Oakland, Alameda County, California*, submitted to Forest City Residential West Inc. (785 Market Street, 14th Floor, San Francisco, CA 94103), by Archeo-Tec (5283 Broadway, Oakland, CA 94618), <http://www.oaklandnet.com/government/ceda/revised/planningzoning/MajorProjectsSection/environmentaldocuments.html>, 2005; Anna Naruta to Claudia Cappio, Development Director, City of Oakland, letter on behalf of the Chinese Historical Society of America Re: Uptown Redevelopment Project MMRP Hist 2a and 2b, Initial Review of Draft Archaeological Plan Dated January 2005, prepared by Archeo-Tec (available at the City of Oakland, Community and Economic Development Agency and <http://UptownChinatown.org>, May 19, 2005).
10. Naruta, "Creating Whiteness," 150.
11. City of Oakland, Planning Commission, Staff Report, Broadway–West Grand Project, City of Oakland Case File Numbers ER03-0022, PUD03552, PUDF03553, December 1, 2004, 28–31; Naruta, *Oakland's San Pablo Avenue Chinatown*; Naruta, "Creating Whiteness," 148–151; Doug Park, Project Manager, Signature Properties, Signature Properties community meeting

to discuss the Broadway–West Grand Project, May 25, 2005; Naruta, letter to Claudia Cappio, Development Director, City of Oakland Community and Economic Development Agency, on behalf of the Chinese Historical Society of America, Re: Broadway–West Grand Mixed-Use Project, Case File Numbers PUD03552, PUDF03553, ER030022, April 20, 2005.

12. State Historical Resources Commission, Department of Parks and Recreation, "State of California Resources Agency Guidelines for the Curation of Archeological Collections," (Sacramento, Office of Historic Preservation, 1993). For a typical cost of archaeological curation, see Museum of Anthropology and Repository for Archaeological Collections, California State University, Bakersfield, "Storage Guidelines," <http://www.csuh.edu/musanth/GdlnsRep.htm> (9001 Stockdale Highway, Bakersfield, CA 93311). Part of the expense associated with archaeological curation is that in order for such facilities to meet their long-term curation goals, they must use only the interest on the curation fee to cover operating costs. "The San Francisco Bay Area currently suffers from a shortage of acceptable curation facilities," note Allen G. Pastron and Allison Vanderslice, *Archaeological Sensitivity Study and Testing Program for the Uptown Chinatown Project, City of Oakland, Alameda County, California*, submitted to Forest City Residential West Inc. (785 Market Street, 14th Floor, San Francisco, CA 94103), by Archeo-Tec (5283 Broadway, Oakland, CA 94618), November 2005, 133 (see also 132–134).
13. Kelly Fong, "Nineteenth-Century Oakland Chinese Businesses," report with maps prepared for Anthropology 197 (Independent Research in Oakland Cultural Resources and Cultural Heritage), instructor Anna Naruta, supervisory professor Kent Lightfoot, University of California, Berkeley, Spring 2005 (Oakland, CA: *UptownChinatown.org*, June 2005); on file at the Oakland Cultural Heritage Survey, Oakland Public Library, Oakland Asian Cultural Center, and the Chinese Historical Society of America. For more on the Chinese merchant partnership files, see Bill Greene, Bob Glass, and Daniel Nealand, *A Guide to Records of Asian Americans and Pacific Islanders at the National Archives and Records Administration Pacific Region—San Bruno*, National Archives and Records Administration, Reference Information Paper 111, January 2004.

Fong's research also discovered the additional significance of the 1880s Victorian Italianate false-front stores, part of the nineteenth-century redevelopment of the San Pablo Avenue Chinatown, that still stood on the site of Chinatown. Following the 1906 San Francisco earthquake, they became home to merchant tailoring firm Hing Chong & Company and part of a thriving early twentieth-century Chinese garment district. The story of the rediscovered additional historic significance of buildings and resilience of community presence in that area is recounted in Rick DeVecchio, "Oakland: New Twist in Roots of Chinatown/Effort Under Way to Save Historical Buildings," *San Francisco Chronicle*, East Bay ed., August 5, 2005; Momo Chang, "Digging Up Old Chinatown's Roots—Downtown Oakland Buildings Marked for Demolition May Hold Key to Hidden Past," *Oakland Tribune*, November 6, 2005; and Momo Chang, "History Amid Old Chinatown Demolition—Storefronts Slated for Uptown Wrecking Ball Reveal Past Culture," *Oakland Tribune*, December 6, 2005. Articles are archived at <http://UptownChinatown.org>.